

Exhibit G

CERTIFIED ORIGINAL
LEGALINK BOSTON

Volume: I
Pages: 1-105
Exhibits: None

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. No. 04-10131 RBC

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HEATHER KIERNAN,

Plaintiff

vs.

ARMORED MOTOR SERVICE OF AMERICA, INC.

and FRANCESCO CIAMBRIELLO,

Defendants

----- x

DEPOSITION OF EDWARD O'BRIEN

Thursday, June 16, 2005 - 9:59 a.m.

McLeod Law Offices

77 Franklin Street

Boston, Massachusetts

Reporter: Maureen J. Manzi, CSR

1 APPEARANCES:

2 *** MCLEOD LAW OFFICES

3 (BY WILLIAM J. MCLEOD, ESQ.)

4 77 Franklin Street

5 Boston, Massachusetts 02110

6 (617) 542-2956

7 Counsel for the Plaintiff

8

9 *** MORGAN BROWN & JOY, LLP

10 (BY ALLISON K. ROMANTZ, ESQ.)

11 200 State Street

12 Boston, Massachusetts 02109

13 (617) 523-6666

14 Counsel for the Defendant, Armored Motor
15 Service of America, Inc.

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I N D E X

EDWARD O'BRIEN

BY MR. MCLEOD

4, 93

BY MS. ROMANTZ

84

E X H I B I T S

- NONE -

P R O C E E D I N G S

EDWARD O'BRIEN, having been
satisfactorily identified by the production of his
driver's license, and duly sworn by the Notary
Public, was examined and testified as follows:

MR. MCLEOD: Same stipulations as before

MS. ROMANTZ: That's fine.

DIRECT EXAMINATION

BY MR. MCLEOD:

Q. Mr. O'Brien, you have the right to read the
transcript that the court reporter is going to be
preparing today and make any corrections that you
wish. You'll be able to do that within a 30 day
period after we receive it. Is that something you'd
like to do?

A. I might.

Q. I'll make it available for you then.

A. Yes.

Q. You'll have 30 days. You won't have to sign
it in the presence of a notary.

A. Okay. I have to sign off on it though,
right?

Q. You don't have to, but if you want to, you
have that right.

1 know what was going on up to that point.

2 Q. And what did Mr. Bucci say or instruct you
3 to do, if anything?

4 A. I don't recall anything that he instructed
5 me to do. I believe I told him what we had to that
6 point and what was seen on the video, and that he
7 was going to confer with the HR Personnel Department
8 in how to handle the Ciambriello situation,
9 specifically the violation of going outside the
10 building -- leaving the building unattended which
11 is, you know, is subject -- it can be disciplined by
12 termination.

13 Q. When you say unattended, what do you mean?

14 A. There was nobody inside the building to
15 answer the radios of the other trucks that were out
16 there. There was large quantities of cash in the
17 vaults. A very dangerous situation for all
18 concerned. It would be similar to, our trucks on
19 the road, there's always somebody in a truck. You
20 know, they don't stand outside the truck. If both
21 of them are outside, they'd both be fired because we
22 can't allow that to happen because bad guys are
23 watching us. But they do, they watch that -- that
24 particular building, there had been a -- in

1 Q. Ultimately responsible for the branch?

2 A. Yeah, for all that.

3 Q. I'm all set.

4 MS. ROMANTZ: Great. I am, too.

5 (Whereupon, at 12:09 p.m., the
6 deposition of Edward O'Brien adjourned.)
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E R R A T A S H E E T

I, EDWARD O'BRIEN, do hereby certify that I have read the foregoing transcript of my testimony, and further certify that it is a true and accurate record of my testimony (with the exception of the corrections listed below):

Page	Line	Correction
_____	_____	_____
_____	_____	_____
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Signed under the pains and penalties of perjury this
____ day of _____, 2005

EDWARD O'BRIEN

1 COMMONWEALTH OF MASSACHUSETTS

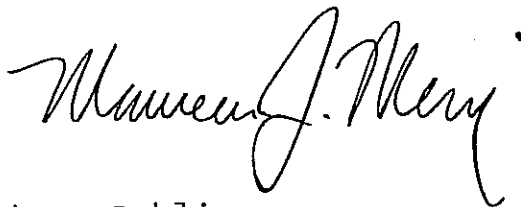
2 MIDDLESEX, ss.

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3 I, Maureen J. Manzi, Certified Shorthand
4 Reporter and Notary Public, CSR #135093, duly
5 commissioned and qualified in and for the
6 Commonwealth of Massachusetts, do hereby certify
7 that there came before me on the 16th day of June,
8 2005 the person hereinbefore named, who was by me
9 duly sworn to testify to the truth and nothing but
10 the truth of their knowledge touching and concerning
11 the matters in controversy in this cause; that they
12 were thereupon examined upon their oath, and their
13 examination reduced to typewriting under my
14 direction and that the deposition is a true record
15 of the testimony given by the deponent.

16 In Witness whereof, I have hereunto set my
17 hand and affixed my seal this 26th day of June,
18 2005.

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22 Notary Public

23 My Commission Expires:

24 January 17, 2008